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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

)
Investigation by the Department on its own)
Motion as to the propriety of the rates and)
charges set forth in M.D.T.E No. 17, filed with)
the Department on May 5, 2000 to become)
98-57, Phase III
effective June 4 and June 6, 2000 by New)
England Telephone and Telegraph Company)
d/b/a Bell Atlantic – Massachusetts)
_____)

D. T. E.

BELL ATLANTIC-MASSACHUSETTS'
FIRST SET OF INFORMATION REQUESTS TO
RHYTHMS LINKS/COVAD COMMUNICATIONS COMPANY

Bell Atlantic-Massachusetts ("BA-MA"), requests that Rhythms Links/Covad Communications Company ("RLI/CVD") respond to the following information requests addressed to it or its witness in the above proceeding. In the event that responses to all or part of these requests will not be forthcoming in the time period established by the Massachusetts Department of Telecommunications and Energy at that technical session, kindly notify BA-MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if RLI/CVD or its representative (witness) receives or generates additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If RLI/CVD feels that any request is ambiguous, please notify BA-MA so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

A. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct

case in this proceeding.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of "documents" which are to be identified shall include the documents that do exist.

D. Please serve a copy of the responses to these requests on the Company's attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1-1 Please provide any workpapers, studies, analysis, diagrams, and reference materials,

vendor documents or other written or electronic materials which you rely upon in concluding that the collocation intervals you have proposed in this proceeding are either

achievable and/or necessary to meet your business needs. This request specifically includes by non-limiting example any such materials which shows that the existing collocation interval applicable to collocation is not sufficient to meet your business needs as compared to the one you have proposed.

1-2 Describe the processes, methods, procedures and systems you use to track, inventory and forecast the need for augments to your collocation arrangements for unbundled DSL

loops and/or linesharing arrangements of any type. This request specifically includes by non-limiting example the timeframes involved in determining when an augmentation need will arise. Provide documentation sufficient to show the processes, systems, methods, procedures, and timeframes identified.

1-3 State whether the processes, methods, procedures and systems identified in response to the preceding question also apply to each of the following types of augmentations: power, voice grade/DS0, DS1 and DS3. For each type of augmentation where these processes do not apply, describe (A) why they do not apply and (B) how these augmentations are identified differently.

1-4 If not previously provided in response to Question No. 1-2, describe in detail and provide documentation sufficient to identify the triggering factor(s) used by your company to determine when to augment existing collocation arrangements (physical and/or virtual). Specify the triggers for ordering additional capacity from Bell Atlantic for each type of the following augmentations: power, voice grade/DS0, DS1, DS3 unbundled DSL loops and/or linesharing.

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1-5 Please state whether the triggers identified in your answer to Question No. 1-3 can be adjusted to compensate for changes in an existing interval and/or differences between jurisdictions in the interval.

1-6 If the answer to Question No. 1-5 is anything other than an unqualified "yes," please provide any workpapers, studies, diagrams, and reference material that supports your answer.

1-7 Please provide a description of the processes and procedures that your company relies on to include requests for cable terminations in support of unbundled DSL loops and /or linesharing, on a going forward basis, when requesting new collocation arrangements. Please provide copies of documentation sufficient to show the methods and procedures used by your company to document these processes and procedures.

1-8 Provide the current utilization for each type of termination at all of your company's collocation arrangements in the state. Specify this information separately for voice grade/DS0, DS1 and DS3, unbundled DSL loops and linesharing.

1-9 Provide documentation sufficient to show the forecasts your company relied upon to determine the timing of all collocation augments ordered by your company in the state in the past 12 months. This request specifically includes by non-limiting example the forecasts used to trigger each specific augment, the date your company determined that an augment was necessary and the date an augment was ordered from Bell Atlantic.

1-10 As part of the previous question, provide the utilization at the time the augment was ordered and the current utilization.

1-11 Provide the current actual growth rate of each of your collocation arrangements in the state by type of termination. Specify separately for voice grade/DS0, DS1, DS3, unbundled DSL loops and linesharing.

1-12 Identify and provide documentation sufficient to show any collocation arrangements in the state in the past 12 months where your existing termination capacity was insufficient to handle actual requests for service by your customers. Include in your identification the date capacity was exhausted and date any augment was ordered from Bell Atlantic

1-13 Identify and provide documentation sufficient to show each instance in the past 12 months in the state in which your company requested an expedited augment to an existing collocation arrangement for any reason, including lack of facilities.

1-14 Describe and provide documentation sufficient to show your company's timeline for equipment installation in a collocation arrangement following the provision of space from Bell Atlantic.

1-15 Provide the actual timeframes achieved from space turnover (MOP date) to equipment turnup date for each of your company's collocation arrangements with Bell Atlantic in the state during the last 12 months. Provide the date the first order for service was placed for all active collocation arrangements from January 1998 to present.

1-16 Provide the actual number of collocation augments that your company has ordered

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from Bell Atlantic in the state in the past 12 months for voice grade/DS0, DS1, DS3 and unbundled DSL loops.

1-17 Provide the actual number of collocation applications your company has submitted to Bell Atlantic in the state in the last 12 months.

1-18 Describe in detail the processes your company uses to ensure that its cable termination inventory is accurate and timely. Identify any and all situations where cable termination discrepancies have been found within the past 12 months. Describe the processes and procedures that have been implemented by your company to ensure that these discrepancies will not occur in the future.

1-19 If the processes referenced in Question No. 1-18 have not been implemented, please state when they will be implemented. If these processes will not be implemented, please provide detailed explanations of why.

1-20 Some CLECs take the position that the collocation intervals they propose are achievable because the installation of tie cables is allegedly a "simple task." If you have the same opinion, please provide any studies, work papers, analysis, or other reference materials relied on to support this position. If your company's answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background and education that qualifies them as a subject matter expert.

1-21 With respect to your company's purported need to have Bell Atlantic-owned splitters available for so called "line-at-a-time" provisioning, describe in detail how your company would ensure that the correct quantity of splitters are available to it unless your company provides Bell Atlantic with a forward looking forecast of its demand on a central office by central office basis? Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-22 Please provide a comprehensive list of the end user customer services, and/or technical capabilities or features that your company cannot sell/provide using the "Scenario A" or "Scenario C" splitter arrangements but would be able to provide if it has access to Bell Atlantic owned and supplied splitters for line sharing. Please provide any workpapers, studies, analysis, diagrams and reference materials which supports your answer.

1-23 With respect to your company's supposed need for Bell Atlantic owned and supplied splitters available for so called "line-at-a-time" provisioning, please provide a description of the procedures your company feels are necessary to ensure that the correct vintage, type and electrical characteristics of splitter is available in a particular Bell Atlantic Central Office for "line-at-a-time" provisioning to your company and other companies. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-24 Please describe the mechanism you would propose for the recovery of Bell Atlantic's stranded investment when changes of equipment types used by Data Local Exchange Companies ("DLECs") result in unused and unusable splitters owned by Bell Atlantic and installed for DLEC use in Bell Atlantic Central Offices. Please address specifically the allocation of this stranded investment to specific DLECs in a multi-provider environment. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

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1-25 Please explain fully and produce all cost studies, analyses, calculations and/or any related documentation that support your statement that competitors in Massachusetts would experience "increased costs associated with splitter deployment at locations other than the MDF." (Direct Panel Testimony, at 114).

1-26 Please provide the complete basis for your statement that loop qualification requires no cost causing work for Bell Atlantic. Please provide any workpapers, studies, analysis, diagrams, reference materials, or other documents which supports your answer.

1-27 Your company has taken the position that it is technically feasible to provide line sharing on loops that traverse fiber fed DLC. Please provide any workpapers, studies, analysis, diagrams, reference materials or other documents which supports your answer.

1-28 With reference to Question 1-27 above, please describe the currently commercially available vendor equipment that provides this functionality and the vendor costs for such equipment. Please provide any workpapers, contracts, studies, analysis or other materials that support your answer.

1-29 In reference to the previous question, what [if any] testing, qualification, analysis has been done by your company or by consultants hired by your company to insure that any proffered solution (technology, equipment, assemblies, etc.) meet standards required for collocated equipment in Bell Atlantic space, e.g., NEBS and ANSI compliance. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-30 Some CLECs have taken the position that the most efficient network construct for loops in a modern network is one which utilizes fiber feeder with suitable electronics to provide individual subscriber loop equivalents. Does your company agree that such an outside plant architecture is the appropriate one for a current, up-to-date, efficient network? Explain your answer in full, and provide any workpapers, studies, analysis, diagrams, and reference materials which supports it. If your answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background and education that qualifies them as a subject matter expert.

1-31 With regard to Question No. 30, please describe in detail the technical and functional equipment used to provide xDSL services to customers served by the architectures and arrangements described. Please provide any workpapers, studies, analysis, diagrams, reference materials, or other documents which supports your answer. If your answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background and education that qualifies them as a subject matter expert.

1-32 Please provide a technical description of the nature and type of transmission facility (including electrical characteristics of the bandwidth, modulation and signaling) required to transmit customer data from the DLEC DSLAM at a remote terminal back to the DLEC Collocation cage at the Bell Atlantic Central Office. Please provide any workpapers, studies, analysis, diagrams, reference materials, or other documents which supports your answer. If your answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background

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and education that qualifies them as a subject matter expert.

1-33 State whether you agree or disagree that you have access to the metallic sub-loops of Bell Atlantic's network in this state. Explain your answer in full.

1-34 Please describe what additional requirements, if any, you claim your company requires for access to the unbundled sub-loop. Please confine your response specifically to issues concerning access to the metallic portion of the loops.

1-35 State whether you agree or disagree that you have access to the Remote Terminal Equipment Enclosures ("RTEEs") of Bell Atlantic's network

1-36 Please describe what additional requirements, if any, you maintain your company requires for access to the Remote Terminal Equipment Enclosures. Please confine your response specifically to issues concerning access to the RTEEs.

1-37 Based on the assumption that Bell Atlantic will mark in its OSSs any line shared customer account and use that marking to exclude any such lines from conversion to service via SLC or DLC, please describe what other situations could necessitate Bell Atlantic to perform a Line Station transfer for the DLEC or customer's benefit.

1-38 With regard to DSLAMS at Remote Terminals, please provide a technical description of the nature and type of transmission facility (including electrical characteristics of the bandwidth, modulation and signaling) required to transmit customer data from the DLEC DSLAM back to the DLEC Collocation cage at the Bell Atlantic Central Office. Please provide any workpapers, studies, analysis, diagrams, reference materials, or other documents which supports your answer. If your answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background and education that qualifies them as a subject matter expert.

1-39 Please describe the technical limitations on the CLEC provision of xDSL data and simultaneous voice on unbundled loops cabled via a POT bay into a CLEC collocation cage. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-40 Please provide copies of any business plans that reference the provision of ADSL or any other xDSL services anywhere in this state.

1-41 With respect to splitter purchases, please state: (A) how many and types of splitters that your company has purchased or plans to purchase for installation in this state during 2000, 2001 and 2002; (B) how many splitters your company has purchased or plans to purchase for installation nation-wide during 2000, 2001, 2002; (C) how many splitters your company installed in this state by June 30, 2000; and (D) the average price that your company has contracted to pay for splitters. Provide copies of the contracts that your company has entered into to make such splitter purchases.

1-42 Please provide copies of any documents or correspondence exchanged between your company and any splitter vendor regarding the types of splitters that will be available during the next five years.

1-43 Please provide any studies, technical explanations or demonstrations that address the contention that the splitter needs to be as physically close to the end user as possible. Please provide any workpapers, studies, analysis, diagrams, and reference materials, vendor documents or other written or electronic communications your company has relied on to make such a statement.

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COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Investigation by the Department on its own)
Motion as to the propriety of the rates and)
charges set forth in M.D.T.E No. 17, filed with)
the Department on May 5, 2000 to become)

D. T. E. 98-57, Phase

III

effective June 4 and June 6, 2000 by New)
England Telephone and Telegraph Company)
d/b/a Bell Atlantic – Massachusetts)

BELL ATLANTIC-MASSACHUSETTS'
FIRST SET OF INFORMATION REQUESTS TO
AT&T COMMUNICATIONS OF NEW ENGLAND, INC.

Bell Atlantic-Massachusetts ("BA-MA"), requests that AT&T Communications of New England, Inc. ("AT&T") respond to the following information requests addressed to it or to its witnesses in the above proceeding. In the event that responses to all or part of these requests will not be forthcoming in the time period established by the Massachusetts Department of Telecommunications and Energy at that technical session, kindly notify BA-MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if AT&T or its representative (witness) receives or generates additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

If AT&T feels that any request is ambiguous, please notify BA-MA so that the request may be clarified prior to the preparation of a written response.

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DEFINITIONS AND INSTRUCTIONS

A. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of "documents" which are to be identified shall include the documents that do exist.

D. Please serve a copy of the responses to these requests on the Company's attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1-1 In a scenario where the voice CLEC ("VLEC") is providing its end user voice service and the VCLEC partner with a data LEC ("DLEC") to provide that same customer xDSL service, is it your position that both the VCLEC and Data LEC need a collocation presence? If the answer is yes, please describe the network architecture that would be employed by the two CLECs to accomplish the provision of this jointly provided service. To the extent your answer is no, please describe the relationship between the two providers, the relationship the two providers have with BA-MA and the network architecture which would be employed to accomplish the service offering. Based on your answer to the above question, please provide any studies, vendor documentation or other document that supports a position that the service provision as described above can not be accomplished using the existing splitter configurations (Options A and C) offered by BA-MA.

1-2 Please provide any studies, documentation, and /or vendor information that demonstrates or supports the position that processing a request to convert an

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existing VLEC UNE- P customer to DSL by adding DSL to the line can be accomplished without physically handling the loop and voice switch cross connects.

1-3 Please provide copies of any business plans that reference the provision of ADSL or any other xDSL services anywhere in this state.

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

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Investigation by the Department on its own)
Motion as to the propriety of the rates and)
charges set forth in M.D.T.E No. 17, filed with)
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D.T.E. 98-57, Phase III
effective June 4 and June 6, 2000 by New)
England Telephone and Telegraph Company)
d/b/a Bell Atlantic – Massachusetts)
_____)

BELL ATLANTIC-MASSACHUSETTS'
FIRST SET OF INFORMATION REQUESTS TO
DIGITAL BROADBAND COMMUNICATIONS COMPANY

Bell Atlantic-Massachusetts ("BA-MA"), requests that Digital Broadband Communications, Inc. ("DBC") respond to the following information requests addressed to it or to its witnesses in the above proceeding. In the event that responses to all or part of these requests will not be forthcoming in the time period established by the Massachusetts Department of Telecommunications and Energy at that technical session, kindly notify BA-MA as soon as possible.

These requests shall be deemed continuing so as to require further and supplemental responses if DBC or its representative (witness) receives or generates additional information within the scope of these requests between the time of the original responses and the end of hearings in this proceeding.

All responses should conform to the specifications as given in the Definitions and Instructions, with respect to dates, documents, claims or privileges, etc.

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If DBC feels that any request is ambiguous, please notify BA-MA so that the request may be clarified prior to the preparation of a written response.

DEFINITIONS AND INSTRUCTIONS

A. With respect to each question, please state: (1) the name(s) and title(s) of the person or persons responsible for preparing the response; (2) the name(s) and title(s) of the person or persons who would be competent to testify concerning the response, whether or not that person will be called as part of the party's direct case in this proceeding.

B. The words "document" and "documentation" are used in their broadest sense and include, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, handwritten notes, workpapers, records or reports, bills, checks, articles from journals, or other sources, contracts, agreements, pamphlets, plans, specifications, summaries, studies, and any other data compilations or written matter of any kind from which information can be obtained, and all copies of such documents which bear notations, marginal comments or other markings that differentiate such copies from the original.

C. In the event that documents containing the exact information requested do not exist, but documents do exist that contain portions thereof or which contain substantially similar information, then the definition of "documents" which are to be identified shall include the documents that do exist.

D. Please serve a copy of the responses to these requests on the Company's attorney, Barbara Anne Sousa, 185 Franklin Street, Room 1403, Boston, Massachusetts 02110-1585. Please make every effort to expedite delivery of responses to these requests, including shipping by Express Mail, UPS, Federal Express, Purolator Courier, or means of equal or greater speed.

INFORMATION REQUESTS

1-1 Please provide any workpapers, studies, analysis, diagrams, and reference materials,

vendor documents or other written or electronic materials which you rely upon in concluding that the collocation intervals you have proposed in this proceeding are either achievable and/or necessary to meet your business needs. This request specifically includes by non-limiting example any such materials which shows that the existing collocation interval applicable to collocation is not sufficient to meet your business needs as compared to the one you have proposed.

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1-2 Describe the processes, methods, procedures and systems you use to track, inventory and forecast the need for augments to your collocation arrangements for unbundled DSL loops and/or linesharing arrangements of any type. This request specifically includes by non-limiting example the timeframes involved in determining when an augmentation need will arise. Provide documentation sufficient to show the processes, systems, methods, procedures, and timeframes identified.

1-3 State whether the processes, methods, procedures and systems identified in response to the preceding question also apply to each of the following types of augmentations: power, voice grade/DS0, DS1 and DS3. For each type of augmentation where these processes do not apply, describe (A) why they do not apply and (B) how these augmentations are identified differently.

1-4 If not previously provided in response to Question No. 1-2, describe in detail and provide documentation sufficient to identify the triggering factor(s) used by your company to determine when to augment existing collocation arrangements (physical and/or virtual). Specify the triggers for ordering additional capacity from Bell Atlantic for each type of the following augmentations: power, voice grade/DS0, DS1, DS3 unbundled DSL loops and/or linesharing.

1-5 Please state whether the triggers identified in your answer to Question No. 1-3 can be adjusted to compensate for changes in an existing interval and/or differences between jurisdictions in the interval.

1-6 If the answer to Question No. 1-5 is anything other than an unqualified "yes," please provide any workpapers, studies, diagrams, and reference material that supports your answer.

1-7 Please provide a description of the processes and procedures that your company relies on to include requests for cable terminations in support of unbundled DSL loops and /or linesharing, on a going forward basis, when requesting new collocation arrangements. Please provide copies of documentation sufficient to show the methods and procedures used by your company to document these processes and procedures.

1-8 Provide the current utilization for each type of termination at all of your company's collocation arrangements in the state. Specify this information separately for voice grade/DS0, DS1 and DS3, unbundled DSL loops and linesharing.

1-9 Provide documentation sufficient to show the forecasts your company relied upon to determine the timing of all collocation augments ordered by your company in the state in the past 12 months. This request specifically includes by non-limiting example the forecasts used to trigger each specific augment, the date your company determined that an augment was necessary and the date an augment was ordered from Bell Atlantic.

1-10 As part of the previous question, provide the utilization at the time the augment was ordered and the current utilization.

1-11 Provide the current actual growth rate of each of your collocation arrangements in the state by type of termination. Specify separately for voice grade/DS0, DS1,

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DS3,
unbundled DSL loops and linesharing.

1-12 Identify and provide documentation sufficient to show any collocation arrangements in the state in the past 12 months where your existing termination capacity was insufficient to handle actual requests for service by your customers. Include in your identification the date capacity was exhausted and date any augment was ordered from Bell Atlantic

1-13 Identify and provide documentation sufficient to show each instance in the past 12 months in the state in which your company requested an expedited augment to an existing collocation arrangement for any reason, including lack of facilities.

1-14 Describe and provide documentation sufficient to show your company's timeline for equipment installation in a collocation arrangement following the provision of space from Bell Atlantic.

1-15 Provide the actual timeframes achieved from space turnover (MOP date) to equipment turnup date for each of your company's collocation arrangements with Bell Atlantic in the state during the last 12 months. Provide the date the first order for service was placed for all active collocation arrangements from January 1998 to present.

1-16 Provide the actual number of collocation augments that your company has ordered from Bell Atlantic in the state in the past 12 months for voice grade/DS0, DS1, DS3 and unbundled DSL loops.

1-17 Provide the actual number of collocation applications your company has submitted to Bell Atlantic in the state in the last 12 months.

1-18 Describe in detail the processes your company uses to ensure that its cable termination inventory is accurate and timely. Identify any and all situations where cable termination discrepancies have been found within the past 12 months. Describe the processes and procedures that have been implemented by your company to ensure that these discrepancies will not occur in the future.

1-19 If the processes referenced in Question No. 1-18 have not been implemented, please state when they will be implemented. If these processes will not be implemented, please

provide detailed explanations of why.

1-20 Some CLECs take the position that the collocation intervals they propose are achievable because the installation of tie cables is allegedly a "simple task." If you have the same opinion, please provide any studies, work papers, analysis, or other reference materials relied on to support this position. If your company's answer relies in whole or part on the use of Subject Matter Experts, please provide the individual's names, titles and their qualifications, background and education that qualifies them as a subject matter expert.

1-21 With respect to your company's purported need to have Bell Atlantic-owned splitters available for so called "line-at-a-time" provisioning, describe in detail how your company would ensure that the correct quantity of splitters are available to it unless your company provides Bell Atlantic with a forward looking forecast of its demand on a central office by central office basis? Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-22 Please provide a comprehensive list of the end user customer services, and/or technical capabilities or features that your company cannot sell/provide using the

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"Scenario A" or "Scenario C" splitter arrangements but would be able to provide if it has access to Bell Atlantic owned and supplied splitters for line sharing. Please provide any workpapers, studies, analysis, diagrams and reference materials which supports your answer.

1-23 With respect to your company's supposed need for Bell Atlantic owned and supplied splitters available for so called "line-at-a-time" provisioning, please provide a description of the procedures your company feels are necessary to ensure that the correct vintage, type and electrical characteristics of splitter is available in a particular Bell Atlantic Central Office for "line-at-a-time" provisioning to your company and other companies. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-24 Please describe the mechanism you would propose for the recovery of Bell Atlantic's stranded investment when changes of equipment types used by Data Local Exchange Companies ("DLECs") result in unused and unusable splitters owned by Bell Atlantic and installed for DLEC use in Bell Atlantic Central Offices. Please address specifically the allocation of this stranded investment to specific DLECS in a multi-provider environment. Please provide any workpapers, studies, analysis, diagrams, and reference materials which supports your answer.

1-25 Please provide copies of any business plans that reference the provision of ADSL or any other xDSL services anywhere in this state.

1-26 With respect to splitter purchases, please state: (A) how many and types of splitters that your company has purchased or plans to purchase for installation in this state during 2000, 2001 and 2002; (B) how many splitters your company has purchased or plans to purchase for installation nation-wide during 2000, 2001, 2002; (C) how many splitters your company installed in this state by June 30, 2000; and (D) the average price that your company has contracted to pay for splitters. Provide copies of the contracts that your company has entered into to make such splitter purchases.

1-27 Please provide copies of any documents or correspondence exchanged between your company and any splitter vendor regarding the types of splitters that will be available during the next five years.

1-28 Please provide any studies, technical explanations or demonstrations that address the contention that the splitter needs to be as physically close to the end user as possible. Please provide any workpapers, studies, analysis, diagrams, and reference materials, vendor documents or other written or electronic communications your company has relied on to make such a statement.